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[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,**

Plaintiffs,

vs.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
LODGE MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(b),
2 and Section 14.3 of the Revised Stipulation and Protective Order issued by this Court on February
3 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis
4 Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated
5 (collectively, "Plaintiffs") hereby move this Court for leave to lodge under seal two documents
6 relating to their Opposition to Zuffa, LLC's Motion To Seal Portions Of Plaintiffs' Reply In Support
7 Of Motion To Challenge Work Product Designation And Related Exhibits.

8 First, Plaintiffs ask this Court to seal the opposition brief itself, an unredacted copy of which
9 is being filed with this motion. Plaintiffs have filed a redacted public copy of this document with the
10 Court.

11 Second, Plaintiffs ask this Court to seal Exhibit 2 to the Declaration of Matthew S. Weiler In
12 Support of Plaintiffs' Opposition to Zuffa, LLC's Motion to Seal, a copy of which is being filed with
13 this motion. Plaintiffs have filed a public placeholder for this document with the Court.

14 Plaintiffs do not believe the materials Defendant seeks to seal are privileged, protected or
15 confidential. Accordingly, Plaintiffs do not believe the opposition brief and exhibit contain
16 privileged, protected or confidential materials either. Nonetheless, Plaintiffs hereby move this Court
17 for leave to file this motion under seal pending this Court's ruling on Plaintiffs' Motion to Challenge
18 Work Product Designation (ECF No. 282) and its ruling on Zuffa, LLC's Motion to Seal (ECF No.
19 305).

1 DATED this 12th day of October, 2016

2 **JOSEPH SAVERI LAW FIRM, INC.**

3 By: /s/ Joseph R. Saveri

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 12th day of October, 2016 a true and correct copy of
3 **PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL** was served via the
4 United States District Court CM/ECF system on all parties or persons requiring notice.

5 By: /s/ Kevin E. Rayhill